

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

JOHN ANTHONY CASTRO  
12 Park Place, Mansfield, TX 76063

Plaintiff,

v.

SECRETARY OF THE OKLAHOMA STATE  
ELECTION BOARD PAUL ZIRIAX  
2300 N Lincoln Blvd, Room G28  
State Capitol Building  
Oklahoma City, OK 73105

DONALD JOHN TRUMP  
1100 S. Ocean Blvd, Palm Beach, FL 33480

Defendants.

**FILED**

SEP 26 2023

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY KB, DEPUTY

Case No. 5:23-cv-00781-JD

**OBJECTION AND OPPOSITION TO MOTION TO INTERVENE FOR LACK OF  
STANDING**

Plaintiff John Anthony Castro, *pro se*, submits this Objection and Opposition to Motion to Intervene for Lack of Standing and states as follows:

Courts have held that once an individual is selected to be a particular political party's nominee, then and only then does the state political party have organizational/associational standing to litigate on behalf of the candidate. *See Texas Democratic Party v. Benkiser*, 459 F.3d 582, 588 (5th Cir. 2006).

The Oklahoma Republican Party's ("ORP") only argument is that they represent Republican voters. For a standing analysis and inquiry, a look-through approach is applied. A regular voter would not have standing to intervene in this case. Likewise, an organization representing thousands of voters does not have standing to intervene in this case.

ORP has not shown that a judicial determination of Defendant Donald John Trump's qualification and eligibility to hold public office would create any impairment to their interests or that Defendant Donald John Trump's lawyers (who have not even submitted a notice of appearance) are inadequately representing his interests.

This is an attempt to provide illegal in-kind campaign support to the preferred candidate of the ORP and the "American Center for Law and Justice," which is the pseudonym for a 501(c)(3) tax-exempt organization called Christian Advocates Serving Evangelism, Inc. ("CASE"). CASE's involvement in this case is unlawful and violative of their status as a purported faith-based non-profit. A brief examination of their website reveals a gross degree of heavy involvement in political matters advocating for and against candidates in blatant violation of federal law.

Furthermore, the ORP's intervention not only fails under existing law but is also likely contrary to federal campaign laws as well.

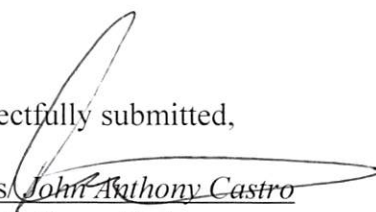
The constitutional determination of qualification and eligibility of a candidate is not a recognized injury that would provide ORP with organizational or associational standing.

#### **REQUESTED RELIEF**

For the foregoing reason, this Honorable Court should not grant the Motion to Intervene unless and until the ORP can satisfactorily show that (1) it has organizational or associational standing, (2) Defendant Donald John Trump's lawyers cannot adequately represent his interests, and (3) ORP's representation would not violate federal campaign finance laws.

Dated: September 22, 2023.

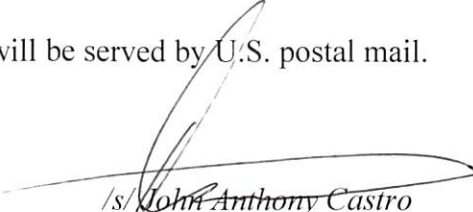
Respectfully submitted,

By:   
John Anthony Castro  
John Anthony Castro

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Mansfield, TX 76063  
(202) 594 – 4344  
J.Castro@JohnCastro.com  
**Plaintiff *Pro Se***

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed with the Court on September 22, 2023 and that all parties will be served by U.S. postal mail.



/s/ John Anthony Castro  
John Anthony Castro